

UNITED STATES DISTRICT COURT

for the
Western District of Oklahoma

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

Lee Grant Clark

Case No. 25-MJ- 403-STE

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A, which is attached and incorporated by reference.

located in the Western District of Oklahoma, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, which is attached and incorporated by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2251(a)	Sexual Exploitation of a Child

The application is based on these facts:
See attached Affidavit of FBI Special Agent Timothy Doyle.

☒ Continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Timothy Doyle, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: Jun 20, 2025

OKC, OK

City and state: [REDACTED]

Shon T. Erwin

Judge's signature

Shon T. Erwin U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

AFFIDAVIT IN SUPPORT OF SEARCH WARRANT

I, Timothy Doyle, being duly sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the FBI and have been so employed since approximately September 2015. I am currently assigned to the FBI's Oklahoma City Field Office, Stillwater Resident Agency. As part of my duties as an FBI Special Agent, I investigate federal criminal violations, to include child exploitation and abuse violations. As a result of my training and experience, including information provided by other federal agents with applicable knowledge, I am familiar with the tactics, methods, and techniques used by criminals in cases such as this. As part of my job, I have conducted numerous investigations involving the use of the internet, smart phones, email, and social media to further criminal activity. I have participated in the execution of multiple federal search warrants involving various types of evidence and property.

OVERVIEW AND PURPOSE OF AFFIDAVIT

2. This affidavit is made in support of an application for a search warrant of Lee Grant Clark, described in Attachment A hereto, to seize by way of photographing, the items specified in Attachment B hereto, namely, photographs of Clark's entire nude body, including his penis; arms; torso; hands; and knuckles.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit

is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that Clark used his body to commit sexual acts on multiple minor females and created videos of the same. The requested photographs will be used for comparison to child pornography videos already recovered as part of an ongoing federal investigation into production of child pornography in violation of 18 U.S.C. § 2251(a). The requested photographs will be used for potential identification purposes, specifically to identify or eliminate Clark as the adult male seen in the videos.

5. The photographs are to be taken and utilized in the manner further described in the following paragraphs and in Attachment B.

6. As set forth herein, there is probable cause to believe that the requested photographs will constitute evidence of violations of Title 18, United States Code, Section 2251(a) which states, in pertinent part, that it is a crime to knowingly employ, use, persuade, induce, entice, or coerce any minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct if that visual depiction was produced using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce, or if that visual depiction was transported in interstate or foreign commerce.

PROBABLE CAUSE

7. During the course of an investigation into violations of 18 U.S.C. § 2252A(a)(5)(B) and (b)(2), Possession of and/or Access with Intent to View Material

Containing Child Pornography (or attempting the same), and 18 U.S.C. § 2252A(a)(2)(A) and (b)(1), Receipt of Child Pornography (or attempting the same), FBI identified Lee Grant Clark, resident of 1109 S. Lewis, Stillwater, OK 74074 (the “SUBJECT PREMISES”) as a primary suspect. After confirming Clark resided at the SUBJECT PREMISES, the FBI obtained a federal search warrant for the SUBJECT PREMISES, which included the search of electronic devices seized from the SUBJECT PREMISES. This warrant was executed on May 6, 2025. There were no indications of anyone other than Clark living at the SUBJECT PREMISES.

8. The FBI seized Clark’s T-Mobile Revvl V cellular phone.¹ The FBI’s Computer Analysis Response Team (CART) began previewing it on-scene. Some images of child sexual abuse material (CSAM) were located on the phone in a locally stored pictures folder. Those include the following: In the filepath of Dump\data\media\0\Pictures\Nudes\20210628_193749.jpg is a photo of what appears to be young girl around 13-15 years of age. She is completely nude and laying down with arms and legs spread with both breasts and genitals exposed. There is another photo at file path Dump\data\media\0\Pictures\Nudes\20210628_193038.jpg depicting what appears to be a different young girl around 13-15 years of age. This girl is completely nude standing facing the camera with both breasts and genitals exposed.

9. Clark’s computer, which was a NZXT, model CATH500BTW1, S/N: 01184666703612, was also seized. Dontknowdoya is the user name for this computer. The

¹ To my knowledge, this phone was not manufactured in Oklahoma.

computer could only be partially reviewed while at the SUBJECT PREMISES. Items located on the partial review included the Documents Folder, wherein there is a subfolder named stories, and within this subfolder are additional subfolders named: incest; Loliwood_rip; Loliwood_rip_by_title; MrDoubles stories; PocketFiles; and Twin Sisters. The folder named incest contains writings from authors that discuss: 2rape2.txt – Rape of the persons Mother and Sister; Badboy2.txt – sexual-based chat message between a 13-year-old bisexual girl and 6-year-old sister; incestuo.txt – A story about a father on vacation with his 13 year-old daughter and their baby, and the father having sex with both of them. The folder Loliwood_rip contains 280+ writings describing sex with minors and incest from LoliwoodStudios: Child Erotica at its Best.

10. Additional review of the computer, conducted offsite at a later date, revealed four additional hard drives inside the computer tower. These hard drives could only be accessed after entering the encryption codes for each one. These hard drives are still being reviewed, but multiple images and videos of CSAM were located.

11. Some of the indicators of ownership on the computer included a file named MyHealthVet.txt, which lists the login information for MyHealthVet, with the username leeclark64. Additionally, CART located another file named MyPay.txt, which contained login information, including a username of leeclark64@gmail.com.

12. Additionally, in a cached folder on the computer, CART located several CSAM files. For example, one image depicted a prepubescent female, who was completely nude and laying on a bed, and she had her legs spread so that her genitals were exposed.

The “last modified” date on this image is April 17, 2025. Another image depicted a minor female with her mouth and tongue touching an adult male’s penis.

13. Agents also found numerous discs and tape recordings in the SUBJECT PREMISES. Some, but not all, have been previewed. The discs and tape recordings revealed footage of minor girls. The recordings appeared to show minor girls running around Clark’s home acting silly, laying on beds, and singing and dancing while someone was filming them. Some of the discs also include photos of at least one girl asleep. While the girl was fully clothed, the photos were zoomed in on her buttocks in some of the photos.

14. A review of additional tapes, including both a VHS tape and an 8mm Camcorder tape, revealed video recordings of an adult male sexually abusing two different prepubescent sleeping, or unconscious, girls.² The first video, which is on the VHS tape, depicts the adult male using his hands to expose the vagina of a minor female. This victim has been identified and has disclosed sexual abuse by Clark that occurred when she was a minor. Additionally, the bedding in the video appears to match bedding observed by agents in a photo album depicting nude photos of Clark. This photo album was located during the execution of the warrant at the SUBJECT PREMISES. The second video, which is on the 8mm Camcorder tape, depicts an adult male using his hands to expose the vagina of a minor female and inserting his penis into her mouth. This video depicts bedding that has been identified by adult females as bedding that would have been located at the SUBJECT PREMISES when they were minors. The adult male appears to be Caucasian, and Clark is

² To my knowledge, neither the VHS tape nor the 8mm Camcorder tape was manufactured in Oklahoma.

Caucasian. In one video, multiple dark freckles are seen on the male's torso, which is exposed, and the male is wearing a black robe with gray stripes. The male is also wearing a silver wristwatch with a dark watch face on his left hand. In the other video, the male is wearing short shorts, and he also has the same silver wristwatch with the dark watch face on his left hand.

Proposed Procedure for Execution of the Search Warrant

15. Clark is currently being held at the Pottawatomie County jail in Pottawatomie County, Oklahoma. At the issuance by the Court of the proposed warrant, various photographs will be taken of Clark's unclothed and fully nude body, including his arms (front and back), hands (front and back), and torso and pubic area, including penis, from multiple angles. Investigators will then compare the photographs to the videos discovered during the review of material located during the search warrant of Clark's residence.

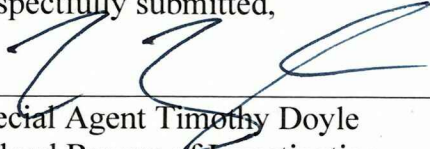
16. Because an accurate and meaningful comparison involves unclothed portions of Clark's body, including and especially his torso, hands, and penis and pubic area, the execution of the warrant will require Clark to disrobe. I propose to inform Clark of the signed search warrant, and then allow Clark to disrobe on his own in the presence of investigators and otherwise make his person available to be photographed, as described in Attachment A. Due to the nature of the photographs, I will have Clark position his arms, hands, and penis in specific ways to allow photographs to be captured from the necessary angles.

CONCLUSION

17. Based upon the information above, probable cause exists to conclude that Lee Grant Clark has violated 18 U.S.C. § 2251(a), in that he used a child to engage in sexually explicit conduct for the purpose of producing visual depictions of that conduct. Additionally, there is probable cause to believe that evidence related to these violations, *i.e.*, identifiers or visible characteristics related to the adult male seen in the videos molesting the minors, is located on the person of Clark.

I hereby swear that the information contained in this affidavit is true and correct to the best of my knowledge.

Respectfully submitted,



Special Agent Timothy Doyle
Federal Bureau of Investigation

Signed and sworn before me this 20th day of June, 2025.



SHON T. ERWIN
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Place to be searched:

The person of Lee Grant Clark, date of birth 06/XX/1947, located in Pottawatomie County Jail in Pottawatomie County, Oklahoma.

ATTACHMENT B

Items to be seized:

- photographs of Lee Grant Clark's nude body including torso;
- photographs of Lee Grant Clark's arms, front and back;
- photographs of Lee Grant Clark's hands, front and back; and
- photographs of Lee Grant Clark's pubic area, including penis, from different angles

PROCEDURE FOR OBTAINING THE PHOTOGRAPHS:

No more than two FBI Agents, along with any Pottawatomie County Jail personnel at the discretion of the Pottawatomie County Sheriff's Office, will be present in the room, along with an optional FBI evidence photographer, when Lee Grant Clark is asked to disrobe and is photographed inside of the Pottawatomie County Jail.

The photographs will be taken in a reasonably private location, at the direction and discretion of the Pottawatomie County Sheriff's Office, taking into account due privacy, security, safety, and operational concerns.

Clark will be permitted to disrobe and position parts of his body as necessary to obtain the photographs described below.